



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAR 28 2016

Mr. Thomas Hmiel
Global Regulatory Affairs Manager
Whitford Corporation
47 Park Avenue
Elverson, Pennsylvania 19520

Dear Mr. Hmiel:

The United States Environmental Protection Agency (EPA) hereby requires Whitford Corporation ("Whitford" or "the Facility") to provide certain information as part of an EPA investigation to determine the Clean Air Act (CAA or the Act) compliance status of the Whitford Corporation located at 47 Park Avenue, Elverson, Pennsylvania 19520.

Pursuant to Section 114(a) of the CAA, 42 U.S.C. Section 7414(a), the Administrator of EPA is authorized to require any person who owns and/or operates an emission source to establish and maintain records, make reports and provide such other information as he may reasonably require for the purposes of determining whether such person is in violation of any provision of the Act. In order for EPA to determine whether a violation has occurred, you are hereby required, pursuant to Section 114(a) of the CAA, to provide responses to the following questions and requests for information regarding your facility. Therefore, you are hereby required to respond to questions and requests for information in Enclosure 2. (See Enclosure 1 for instructions and definitions). All information submitted in response to this request must be certified as true, correct, accurate and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Whitford. On the last page of your response(s) to this Questionnaire, please include the certification contained in Enclosure 3.

Failure to provide the required information may result in the issuance of an Order requiring compliance with the requirements, or the initiation of a civil action pursuant to Section 113(b) of the Act, 42 U.S.C. Section 7413(b). In addition, Section 113(c)(2) of the Act provides that any person who knowingly makes any false material statement, representation, or certification in, or omits material information from any document required pursuant to this Act shall upon conviction be punished by a fine pursuant to Title 18 of the United States Code, or by imprisonment for not more than two years, or both. The information you provide may be used by EPA in administrative, civil and criminal proceedings.

Under 40 C.F.R. Part 2, Subpart B, you may assert a claim of business confidentiality for any portion of the submitted information. You must specify the page, paragraph, and sentence when identifying the information subject to your claim.

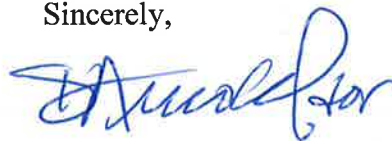
This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic record keeping efforts, please provide your response to this request for information without staples. Paper clips, binder clips, and 3-ring binders are acceptable.

EPA requires Whitford to submit the information requested in Enclosure 2 no later than thirty (30) calendar days after receipt of this letter. EPA requires that Whitford report any changes or revisions to the information supplied within seven (7) days after the change or revision is made. Please submit your response to this request to:

Ms. Zelma Maldonado, Associate Director
U.S. Environmental Protection Agency Region III
Office of Air Enforcement & Compliance Assistance (3AP20)
1650 Arch Street
Philadelphia, PA 19103-2029

If you have any questions regarding this information request, please contact Ms. Kristen Hall of the Office of Air Enforcement & Compliance Assistance at 215-814-2168.

Sincerely,



Nikos Singelis, Acting Director
Air Protection Division

ENCLOSURE 1

A. INSTRUCTIONS

1. Please provide a separate narrative response to each question and subpart of a question set forth in this Information Request. **Please provide the requested non-narrative information in spreadsheet format, preferably in Excel.**
2. Indicate on each document produced in response to this Information Request, or in some other reasonable manner, the number of the question to which it corresponds.
3. Provide as much information possible to completely answer each question. This includes all supporting documentation, such as performance test reports, inspection records, memorandums, facility records, etc. Failure to completely respond to any questions may increase the time necessary to determine compliance with all applicable regulations.
4. For each document provided in response to these questions, provide an accurate and legible copy, which can be used to determine the completeness of this request. For any information submitted electronically, clearly label to which question(s) the data is responsive.
5. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
6. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information is not available or in your possession and identify any source that either possesses or is likely to possess such information.

B. DEFINITIONS

- 1) All terms used in the Information Request will have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. ' 7401 or 40 CFR Part 60, Part 61 or Part 63.
- 2) EPA Region III includes the states of Maryland, Pennsylvania, Virginia, West Virginia, Delaware and the District of Columbia.

ENCLOSURE 2

1. For the VOC Emission Tests conducted at the Elverson Facility on May 22 and November 6, 2013, (a) were the batches in use on the days of the tests, the batches with the highest VOC and HAP content that Whitford makes? If not, please explain why not. And, (b) were the VOCs used in each batch formulation, speciated and accounted for in each batch calculation? If not please explain why not.

2. Please provide any and all calculations used to determine the facility's volatile organic compound (VOC) and hazardous air pollutant (HAP) potential to emit calculations for Clean Air Act purposes. Potential to Emit is defined as, "the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable. Secondary emissions do not count in determining the potential to emit of a stationary source; 40 CFR Part 52.21(b)(4)."

3. Provide the following information for each piece of equipment utilizing a spark ignition (SI) or compression ignition (CI) engine:

- a. The engine type (SI or CI), rich burn (RB) or lean burn (LB), size in brake horsepower (bhp) and/or horsepower (hp), manufacture date of the engine, and the date Whitford "commenced construction" on the engine. Please refer to Enclosure 1 for the definition of commenced construction;
- b. For each engine, indicate if the engine is considered emergency or non-emergency and provide monthly operating hours for each engine for the years 2013 to present. Indicate if the engine has an hour meter and if the meter is resettable;
- c. Indicate if each engine is equipped with a closed crankcase ventilation system;
- d. Provide monthly fuel usage for each engine for the years 2013 to present;
- e. Provide fuel analysis records for fuel burned in each engine for the years 2013 to present;
- f. Provide records of oil and oil filter changes, air filter inspections, and engine hose inspections;
- g. Provide performance specifications on each catalytic converter and data logger installed on the engines, including required operating parameters (pressure and temperature);
- h. Provide data logger catalyst backpressure and temperature data, as collected since installation of each logger and catalyst;
- i. Provide emissions certifications, as provided by the manufacturer of each engine.

4. In the information packet given to the EPA inspectors during the November 17, 2015 EPA inspection, Whitford states that, "mixing vessels and process equipment are now cleaned with a solvent blend formulated with n-Methyl pyrrolidone (NMP) and acetone." Were the NMP VOC emissions from cleanouts included in Whitford's PTE calculation? If not explain why?

5. In the information packet given to the EPA inspectors during the November 15, 2015 EPA Clean Air Act inspection, Whitford cites that, "According to U.S EPA's Emissions Factor and Inventory Group, EPA recognizes that a VOC loss rate of 3.4% may be used as the emission factor for an overall paint and varnish making operation." Please provide a hardcopy or electronic version of the documentation source for this citation.

6. Please provide all Requests for Determinations submitted to PADEP and the calculations used to determine the emissions for these submissions for both Whitford and Polymeric Systems Inc. for the Elverson facility.

ENCLOSURE 3:

STATEMENT OF CERTIFICATION

[This Certification is for signature by the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or another executive with authority to perform similar policy or decision-making functions of the corporation.]

Whitford is submitting the enclosed documents in response to the U.S. Environmental Protection Agency's ("EPA") request for information, issued pursuant to Section 114(a) of the Clean Air Act, to determine whether the facility is in compliance with the Clean Air Act.

I certify that I am fully authorized by Whitford to provide the above information on its behalf to EPA.

I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, correct, accurate and complete. I am aware that there are significant penalties for submitting false statements and information, or omitting required statements and information, including the possibility of fines and imprisonment for knowing violations.

Date: _____

Name (Printed): _____

Signature: _____

Title: _____

ENCLOSURE 4:

Confidential Business Information (CBI)

You may assert a business confidentiality claim covering all or part of the information you provide in response to this information request for any business information entitled to confidential treatment under Section 114(c) of the Clean Air Act (the Act), 42 U.S.C. § 7414, and 40 C.F.R. Part 2, subpart B. Under Section 114(c) of the Act, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means "the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information." See 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the Act and 40 C.F.R. Part 2, subpart B. EPA will construe your failure to furnish a business confidentiality claim with your response to this information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential" at the time you submit your response to this information request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e), (2) that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, (3) the information is not and has not been reasonably obtainable by legitimate means without your consent, and (4) the disclosure of the information is likely to cause substantial harm to your business's competitive edge. See 40 C.F.R. § 2.208 (a)-(d). Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. See 42 U.S.C. § 7414(c); 40 C.F.R. § 2.301(e).

If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this request for information, in accordance with 40 C.F.R. § 2.204(e)(4), EPA is requesting that you answer the following questions with respect to any information or document for which you assert a claim of business confidentiality:

1. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.
2. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you've specified.
3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Is there any other explanation you deem relevant to EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

You must furnish comments to the above questions concurrent with your response to this information request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1).

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your comments may be regarded by EPA as entitled to confidential treatment if, when it is received by EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). As required by 40

C.F.R. § 2.204(e)(6), you may assert a business confidentiality claim covering all or part of your response to these questions, as provided in 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the Clean Air Act (the Act) and 40 C.F.R. Part 2. EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.